

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LOPEZ, et al.,)	
)	
Plaintiffs,)	Civil No. 1:14-cv-05398
)	The Honorable John Robert Blakey
v.)	U.S. District Judge
)	
SMART, et al.,)	
)	
Defendants.)	

COOK COUNTY STATE'S ATTORNEY'S OFFICE
MOTION FOR AGREED PROTECTIVE ORDER

Movant, the Cook County State's Attorney's Office ("CCSAO"), a non-party respondent to a subpoena to produce documents, information, or objects or to permit inspection of premises in a civil action, through its attorney Anita Alvarez, State's Attorney of Cook County, through one of her assistants, Assistant State's Attorney Marie D. Spicuzza moves this Honorable Court for the Agreed Protective Order modeled on LR26.2 Model Confidentiality Order, Attached as Exhibit 1. In support thereof, the CCSAO states:

1. The CCSAO received a subpoena dated September 1, 2015 under case number 14 cv 5398. The subpoena, attached as Exhibit 1, issued through Plaintiff's attorney, commanded the CCSAO to produce all documents listed on the Rider.
2. Because the requested documents contain protected personal identity information, the CCSAO circulated a Protective Order pursuant to LR26.2. All parties agreed to the changes in the Agreed Protective Order, attached as Exhibit 2.

3. Exhibits 3 and 4 are the redlined versions showing the first and second set of changes made to the LR26.2 Model Confidentiality Order to modify the order as appropriate to the instant case.

WHEREFORE, the Cook County State's Attorney moves this Honorable Court to:

- A. Grant CCSAO's Motion for Agreed Protective Order, and
- B. Grant any other relief that is equitable and just.

Respectfully Submitted,

ANITA ALVAREZ
State's Attorney of Cook County

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